April 19, 2024

## Via ECF

The Honorable Katherine Polk Failla, U.S.D.J. Thurgood Marshall United States Courthouse 40 Foley Square New York, New York 10007



Re: Securities and Exchange Commission v. Coinbase, Inc. et al., 23 Civ. 4738 (KPF)

Dear Judge Failla:

Plaintiff Securities and Exchange Commission ("SEC") and defendants Coinbase, Inc. and Coinbase Global, Inc. (together, "Coinbase") respectfully submit this joint letter and the enclosed proposed case management plan to the Court.

The parties met and conferred regarding the proposed case management plan and were able to agree on all terms except for item 7(e)-7(f). As to item 7(e)-7(f) (the close of fact discovery and expert discovery), Coinbase proposes October 18 and December 20, 2024, and the SEC proposes August 19 and October 18, 2024.

Respectfully submitted,

Peter A. Mancuso

Counsel for Plaintiff

Kevin S. Schwartz

Counsel for Defendants

Cc: All counsel of record (via ECF)

The Court is in receipt of the parties' letter and case management plan, which plan it will endorse in a separate order. In light of Defendants' request for leave to appeal, the Court endorses Defendants' proposed discovery date terms.

Dated: / April 19, 2024

New York, New York

SO ORDERED.

HON. KATHERINE POLK FAILLA UNITED STATES DISTRICT JUDGE

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